

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES LIABILITY
INSURANCE CO., INC., AS INSURER OF
ADMINASERVICE, INC.,

Plaintiff,

V.

ADVANTIUS, INC., NEAL BERGSTROM,
ROBERT STEVENS, CHARLES CAMBRA
III, JONATHAN K. DRIGGS, AND
WORKFORCE SOLUTIONS, INC.,

Defendants.

Civil No. 0411824 PBS

SECOND AFFIDAVIT OF JONATHAN K. DRIGGS

STATE OF UTAH)
)
) : ss.
COUNTY OF SALT LAKE)

Upon oath, Jonathan K. Driggs deposes and states as follows:

1. I am an adult residing in the State of Utah and a defendant in the above-captioned action. I have personal knowledge of the facts contained herein and would so testify if called upon to do so.

2. From June 2000 to January 2002, Advantius shared office space with Workforce in Suite 109 of 1111 East Brickyard Road in Salt Lake City, Utah. However, in or about April 2002, Advantius relocated to a second-floor suite of the building, signing its own lease for that space. During the relevant time period alleged in the Complaint, Workforce

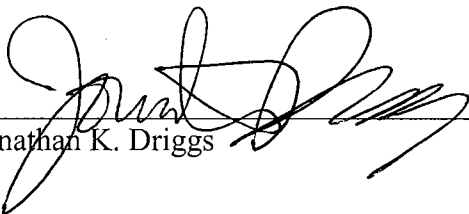
occupied an office separate from Advantius, was not a party to Advantius's lease, and was not a tenant of Advantius's second-floor space.

3. In or about February 2002, Advantius replaced me as an officer of Advantius. I was not an officer or director of Advantius during the time period alleged in the Complaint.

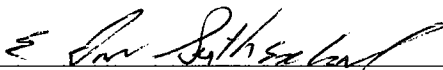
4. I have never been an officer of Workforce.

5. I have never received any of the allegedly converted funds at issue in this case. I have never received any funds from AdminaSource, AdminaService, or Sapers & Wallack insurance agency, whether from those entities or from Advantius indirectly.

Signed under pains and penalties of perjury this 13 day of January, 2005.


Jonathan K. Driggs

SUBSCRIBED AND SWORN TO BEFORE ME this 13 day of January, 2005.


NOTARY PUBLIC

